Water Use Efficiency Subcommittee

Meeting 9 Notes — December 15, 2004

Seattle

Members & Alternates:

Bob Alberts	Gene Eckhardt	Howard Laughery	Debbie Thomas
Karen Allston	Tom Fox	Greg Moore	Frank Triplett
Randy Black	David Fujimoto	Bob Pancoast	Judy Turpin
Ben Bonkowski	Andrew Graham	Harry Paul	Betty Vance
Greg Brizendine	Richard Gustav	Jerry Peterson	Dawn Vyvyan
Tom Clingman	Jim Haneline	Steve Skipworth	Donald Wright
Lynn Coleman	John Kirner	Denise Smith	

DOH Staff & Consultants:

Michelle Austin	Richard Siffert
Rich Hoey	Deana Taylor
Jennifer Kropack	Leslie Thorpe

Others:

Tikva Breuer
John Kounts
Danford Moore

I. Introduction and Housekeeping

A. Rich Hoey outlined the agenda for the meeting.

B. Rich Hoey commented on the Data Collection Presentation and Discussion. In order to be efficient with the remaining time we have left, we will attempt to complete the discussion on Data Collection at this meeting.

C. Rich Hoey made several comments regarding facilitation. He asked attendees not to have side conversations. It takes away from the discussion and who is speaking at the time.

II. Meeting 8 Minutes Review

Rich Hoey outlined the highlights from the Meeting 8 Minutes.

A. Performance Reporting and Accountability Discussion:

i. A number of concerns were expressed at the meeting regarding Satellite Management Entities. It was noted that there is unique circumstances that apply to Satellite Management Entities.

ii. Getting information on goal setting to the public and obtaining their feedback before a public meeting is important.

iii. For the frequency of goal adoption, many agreed six years would be adequate, but another schedule would need to be established for Small Water System Management Programs.

iv. It was noted that performance reporting is not limited to customer's efficiency. DOH reviewed the law and it does include utilities – utility measures, as well as customers.

v. There was agreement that DOH should not specify the mechanism and it should be left up to the utility's discretion.

vi. Members of the Subcommittee were split regarding frequency, especially for small water systems.

vii. There was discussion regarding what information (content) should be included in the report. A recommendation was made that a proposal, such as a matrix by system size, be put into the final Subcommittee report outlining what information needed to be included in the report, depending on the size of the water system.

viii. Compliance will not be written into the rule. DOH will rely on the general enforcement rules all ready in place.

B. It was noted that Meeting 7 Minutes have been changed per the discussion at the November 17, 2004 Water Use Efficiency Subcommittee meeting. A copy of the revised minutes was given to members.

C. There were no changes to the Meeting 8 Minutes.

III. Subcommittee Discussion: Cost Effectiveness – Deana Taylor

A. Deana Taylor led the discussion regarding the Cost Effectiveness Workgroup Report. She made several changes to the report since the last meeting from comments and feedback she received from subcommittee members. Deana also noted that she had several more conversations with Greg Fiske regarding the report. The changes were:

i. Under each perspective the content was expanded to include: 1) where does it come from, and 2) what does it mean.

ii. Added the Cost Effective Evaluation Workgroup Concerns Table (Appendix 1) to the report.

B. Tom Fox distributed a handout titled Source Description Inventory, dated December 14, 2004 that was developed by some subcommittee members.

IV. Continuation of Discussion: Cost Effectiveness – Deana Taylor

A. It was recommended that an economist review the perspectives to ensure costs or benefits aren't double counted. It was also recommended that the economist ensure that "common" economic terms are used.

B. Criteria for the narrative description of society perspective should be developed. One option was the Source Inventory Description handed out at the meeting. Some believe the description must recognize the value of in-stream water. It should use standard formulas for analysis to ease burden for small systems. More discussion on what should be included may be necessary.

C. Source Inventory checklist – It was recommended that this not only be used for the evaluation of cost-effectiveness but also in goal setting and for other decisions the utility managers make.

D. DOH should review Ecology's solid waste's full cost accounting methodology.

E. There was discussion on when avoided costs should be included. It was recommended that all systems include avoided capital costs. That is because capital improvements have a large impact per customer, so it is important to include default approach vs. significant analysis. It was recommended that DOH create checklists, guidance, and default values to assist small water systems with determining their avoided costs.

F. The size categories were discussed. Recommended to move intermediate up to 5,000. Also believed that 1,000 to 50,000 were too large of a category.

G. It was suggested the focus on leakage standard compliance be prioritized before cost effective evaluation for small systems.

H. Add a recommendation that the cost-sharing perspective should be "evaluated" instead of "addressed."

I. A recommendation was made that if a utility is planning on implementing measures they are required to evaluate, the evaluation is not necessary.

J. Please include clarification on how the actual evaluation will be completed. Discuss how to come up with ratios and what that means.

K. Provide some examples of what the different timeframes are for the evaluation analysis.

L. Cost effectiveness must be linked to the goal setting process.

M. There was some question on whether the adder was a legitimate approach, as some believe it is just an arbitrary number. Seattle and Olympia have used this method and DOH will research.

N. It was recommended that DOH begin creating the guidance now and not wait until the rule is done.

O. There was a discussion on when wastewater costs should be included. Options raised were only during the societal perspective, always require for systems owning wastewater utilities, or always require for systems having a wastewater facility within their service area.

P. Good cost effectiveness evaluations require good technical expertise. This may be a problem for small systems. A checklist approach should be developed for all systems, but have information already filled in where feasible.

V. Working Lunch

A. Roadmap:

i. An updated version was given out.

ii. Once the subcommittee report is completed, DOH staff will develop their response in March 2005.

iii. The final WUE Subcommittee report will be presented to the WSAC committee in April 2005. All WUE Subcommittee members are invited to attend the WSAC meeting to hear the recommendations/discussion.

iv. The WUE Process Planning Workgroup will have a conference call in early January (January 3 or 4, 2005) to determine if there should be a January meeting. All suggestions for topics should be sent to DOH by December 23, 2004.

B. Subcommittee Report – Status

i. A draft report outline was given to subcommittee members. Comments should be submitted to DOH staff by December 23, 2004.

C. Update – Other Stakeholder Involvement:

i. The first meeting was held with local government (political side). Feedback was received at the meeting. Some concerns raised are: the definition of enhanced conservation, financial, cost effectiveness, and how we are going use the data collected. Minutes are being developed. Once they are finalized, subcommittee members will receive a copy.

ii. The next stakeholder meeting will be the first part of January 2005 with the business community.

iii. DOH is working on setting up meetings with the tribes and watershed planning groups.

D. Leakage Summary

i. Handout was given out titled "MWL Leakage Standard Input from 2004 Drinking Water Seminars and Questionnaire Summary". Jennifer Kropack gave a summary about the input received from the Drinking Water Seminars regarding the leakage standard.

a. It is the responsibility of utility to come up with a credible method for estimating leakage. Options were provided include: Looking at night/winter use, estimating leakage through industry acceptable practices, or just using production meter data history, tracking and analysis.

b. Others believe that a leakage volume cannot be determined quantitatively unless there are both source and service meter readings. Concerns were raised about issues of synchronizing data from source and service meter reading schedules.

c. There was a question on the difference between "undue and due" economic hardship. It was recommended to strike the word "undue." It was suggested that economic hardship should only be considered for the installation of service meters, not to consider any arguments related to economic hardship because of consumption-based rates.

d. Some members believe service meters should be required even though smaller utilities which attended the Drinking Water Seminars 2004 brought up their concerns about a "blanket" requirement applying to all. Others believe the report should make a strong statement about their fundamental and critical importance to any water use efficiency program, but want the subcommittee acknowledged for the good work it has done, and not remembered only by this contentious issue, or lose public support just because of this position.

E. Richard Gustav passed out a handout titled "Conservation Measures & Definitions for Seattle".

VI. Public Comment

There was no public comment at this time.

VII. Data Collection and Reporting Presentation and Discussion – Jennifer Kropack

A. Jennifer Kropack led the discussion regarding the Data Collection and Reporting Matrix.

B. Source Description:

i. Fish Critical Basins are described by Ecology, as are other in-stream flow rules. There was discussion about what should be included here.

ii. There was a recommendation to add growing into an inchoate right when providing source description information in the WSP.

iii. Source Description Inventory, passed out earlier that day could be used. DOH and other agencies should provide as much of the information as possible.

iv. Ensure source description does not become overly burdensome for utility to collect.

C. System Input:

i. Some members did not see the value of providing weekly data. Peak day from monthly data is averaged and less dramatic than peak day from average weekly data. Isn't MDD enough?

ii. Still unclear whether data is really going to be used. Unsure why data collection is required in a WSP if it will not be analyzed.

iii. A chart recorder can provide weekly information. Systems may not really know what MDD is (only by calculation and estimation). Others felt strongly that daily is what they wanted. But they are willing to compromise to weekly because they understood that daily seemed to be too burdensome. Weekly has merit for determining MDD for plan – it provides a more accurate picture than an estimation or calculation.

iv. Weekly seems overly burdensome, especially for small satellite systems managers traveling to read the source production data. Value won't change whether it's collected weekly or monthly as long as there is a data logger.

v. How does this relate to drought? Difference because collecting information is easy but if others need to look at it later, or if utility is expected to do something with it, it becomes burdensome. Weekly peak snapshot not helpful for conservation purposes – it shows capacity only. Not necessary for law.

vi. The Legislative intent was to look at source to usage information. "System input" is different than just withdrawal/production information. The term "supply" was suggested because it incorporates the environmental factors that seem excluded from utility terminology when they talk in terms of just production.

vii. There was some discussion about individual well use. This is outside the scope of the WUE rule process.

D. Real Loss:

i. A leakage volume cannot be determined quantitatively unless there are meters. Concerns were raised about issues with synchronizing source and service meters.

ii. Another option is needed speaking to miles, population, and leakage in volume. This information should be included in the water loss control action plan.

iii. Option two gives utility flexibility to account (may be caught on terminology) so they can account for whatever uses they have.

E. Service Meters:

i. It had been brought to the subcommittee's attention that there is a strong, adverse reaction to the "blanket" service meter recommendation. Since hearing about the negative reaction, some of the committee members believe, instead of requiring service meters, there should be a strong statement made in the report about their critical importance to water efficiency.

ii. There should also be a statement about how service meters are the best way (most effective) to comply with the regulation.

iii. One option for service meters requirements is if DOH accepts a "water allocation" standard in lieu of metering to meet the leakage standard. And if they don't meet the "water allocation, then DOH should require the utility to put in service meters.

VIII. Public Comment

There was no public comment at this time.

IX. Meeting Wrap-up/Next Meeting Topics

A. The planning committee will determine whether there should be a January meeting based on the topics forwarded to DOH by subcommittee members.